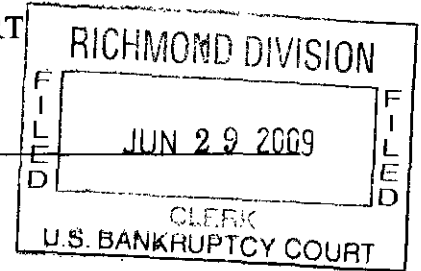


IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



In re: : Chapter 11
: :
CIRCUIT CITY STORES, INC. : Case No. 08-35653
: :
et al., : Jointly Administered
: :
Debtors. :
: x

**RESPONSE OF SUSAN M. JOHNSON TO
DEBTOR'S 12th OMNIBUS MOTION AND OBJECTION TO
PENSION PLAN AND 401(k) PLAN CLAIM (CLAIM 7279)**

TO: Clerk of the Bankruptcy Court, United States Bankruptcy Court, 701 East Broad Street –
Room 4000, Richmond, Virginia, 23219.

Susan M. Johnson, for her response to the above motion states by her legal counsel, Mark C. McCullough, as follows:

1. Susan M. Johnson is a claimant in this matter, claim #083565, seeking to protect my vested pension benefits.
2. On January 26, 2009, Susan M. Johnson filed a claim with Kurtzman Carson Consultants, LLC, asserting a claim for vested pension benefits in the debtor Qualified Pension Plan.
3. The debtors counsel represents that Johnson's pension benefit is fully protected by the Pension Plan Trust and the PBGC and that my Johnson's benefits are protected and secure in the Trust and PBGC.
4. Johnson previously filed with proof of claim the letter from Circuit City setting forth my verified rights.
5. Johnson and her legal counsel have personal knowledge of these matters.
6. Susan M. Johnson's address is: 13056 Brookside Lane North, Rogers, MN 55374. Her legal counsel's address is: Mark C. McCullough, Esq., Skaar & McCullough, 5500 Wayzata Boulevard, Suite 1450, Minneapolis, MN 55416.
7. Johnson represents that any court order dissolving my claim against the debtor's estate specifically preserve her verified pension rights in the Trust and PBGC.

8. If Johnson's vested pension rights are not protected and paid, Johnson asserts a claim against the debtor's assets.

9. On the date hereof, copies of this Response have been served upon the following:

SKADDEN, ARPS, SLATE,
MEAGHER
& FLOM, LLP
One Rodney Square
P.O. Box 636
Wilmington, DE 19899-0636
Attn: Gregg M. Galardi
Attn: Ian S. Fredericks

SKADDEN, ARPS, SLATE,
MEAGHER
& FLOM, LLP
333 West Wacker Drive
Chicago, IL 60606
Attn: Chris L. Dickerson

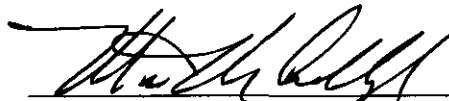
MCGUIREWOODS, LLP
One James Center
901 E. Cary Street
Richmond, VA 23219
Attn: Dion W. Hayes
Attn: Douglas M. Foley

Circuit City Stores, Inc. et al.
Claims Processing Department
Kurtzman Carson Consultants, LLC
2335 Alaska Avenue
El Segundo, CA 90245

10. Susan M. Johnson is also filing this Response with Kurtzman Carson Consultants, LLC, as an administrative claim pursuant to the Court's Order to protect its disallowances unless Johnson's Pension is protected by the Pension Plan and Trust, and PBGC.

SKAAR & McCULLOUGH

Dated: 6/26/2009


Mark C. McCullough (ID# 6998X)
Attorney for Susan M. Johnson
The Colonnade, Suite 1450
5500 Wayzata Blvd.
Minneapolis, MN 55416
(763) 545-0833; fax (763) 545-0834

SKAAR & McCULLOUGH
ATTORNEYS AT LAW
THE COLONNADE, SUITE 1450
5500 WAYZATA BOULEVARD
MINNEAPOLIS, MINNESOTA 55416

MARK C. McCULLOUGH

HARVEY E. SKAAR
OF COUNSEL

TELEPHONE (763) 545-0833
FAX (763) 545-0834
E-MAIL mcm@mcmlaw1.com

June 26, 2009

Clerk of Bankruptcy Court
United States Bankruptcy Court
701 East Broad Street – Room 4000
Richmond, VA 23219

Re: In Re Circuit City Stores, Inc. et al.
Case No. 08-35653

Dear Clerk of Bankruptcy Court:

Please find enclosed the Response of Susan M. Johnson to Debtor's 12th Omnibus Motion and Objection to Pension Plan and 401(k) Plan Claim. A copy of the enclosed is also being served upon Debtor's attorneys with a copy of this letter.

Thank you for your assistance.

Very truly yours,


Mark C. McCullough

MCM:sm
Enclosure

cc: Skadden, Arps, Slate, Meagher & Flom LLP
McGuirewoods, LLP
Circuit City Stores, Inc.
Susan M. Johnson